

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

ALBERT L. GRAY, ADMINISTRATOR
OF THE ESTATE OF DEREK J. GRAY, ET ALS

VS.

C.A. NO.: 04-312-L

MULTI-STATE INSPECTIONS, INC., HIGH
CALIBER INSPECTIONS, INC., ET ALS

ANSWER OF
MULTI-STATE INSPECTIONS, INC. and
HIGH CALIBER INSPECTIONS, INC.

1. The co-defendants, Multi-State Inspections, Inc. and High Caliber Inspections, Inc., do not respond to the introduction of the plaintiffs' Complaint, as said introduction does not require a response.

2. The co-defendants do not have sufficient facts to admit or deny the allegations contained in paragraphs 1 through 226 of the plaintiffs' Complaint and leave the plaintiffs to their proof of same.

GENERAL ALLEGATIONS AS TO ALL DEFENDANTS

3. The answering co-defendants deny all of the allegations contained in paragraph 271 directed to them and do not have sufficient facts to admit or deny the remaining allegations contained in said paragraph and leave the plaintiffs to their proof of same.

JEFFREY DERDERIAN

4. The co-defendants do not have sufficient facts to admit or deny the allegations contained in paragraphs 272 through 279 of the plaintiffs' Complaint and leave the plaintiffs to their proof of same.

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COUNTS I THROUGH LVII, JBL INCORPORATED – STRICT LIABILITY

5. The co-defendants do not have sufficient facts to admit or deny the allegations contained in paragraphs 280 through 569 of the plaintiffs' Complaint and leave the plaintiffs to their proof of same.

ESSEX INSURANCE COMPANY, MULTI-STATE INSPECTIONS, INC.
and HIGH CALIBER INSPECTIONS, INC.

6. The co-defendants repeat herein and reaffirm their answer to paragraphs 1 through 569 of the plaintiffs' Complaint as said co-defendant's answer to paragraph 570 of said Complaint.

7. The co-defendants do not have sufficient facts to admit or deny the allegations contained in paragraph 571 of the plaintiffs' Complaint and leave the plaintiffs to their proof of same.

8. The co-defendants admit the allegations contained in paragraphs 572 and 573 of the plaintiffs' Complaint.

9. The co-defendant, Multi-State Inspections, Inc., admits that it performed an inspection at the premises at 211 Cowesett Avenue on or about October 8, 2002. Said co-defendant denies that it performed an inspection of said premises on April 4, 1996 and March 25, 1998. The co-defendant, High Caliber Inspections, Inc, admits that on or about April 4, 1996 and March 25, 1998 it performed an inspection of the premises at 211 Cowesett Avenue and denies that said corporation performed an inspection as said premises on or about October 8, 2002. Both co-defendants deny each and every other allegation pertaining to them contained in paragraph 574 of the plaintiffs' Complaint. Said co-defendants do not have sufficient facts to admit or deny the allegations directed at the co-defendant Essex Insurance Company and leave the plaintiffs to their proof of same.

10. The answering co-defendants deny each and every allegation directed at them contained in paragraph 575 of the plaintiffs' Complaint and do not have sufficient facts to admit or deny the allegations directed at the defendant Essex Insurance Company and leaves the plaintiffs' to their proof of same.

ESSEX INSURANCE COMPANY – NEGLIGENCE

11. The co-defendants repeat herein and reaffirm their answer to paragraphs 1 through 575 of the plaintiffs' Complaint as said co-defendants' answer to paragraph 576 of the plaintiffs' Complaint.

12. The co-defendants do not have sufficient facts to admit or deny the allegations contained in paragraph 577 of plaintiffs' Complaint and leave the plaintiffs' to their proof of same.

COUNT LVIII

MULTI-STATE INSPECTIONS, INC. – NEGLIGENCE

13. The co-defendants repeat herein and reaffirm their answer to paragraphs 1 through 577 of the plaintiffs' Complaint as said co-defendants' answer to paragraph 578 of the plaintiffs' Complaint.

14. The answering co-defendants deny all allegations pertaining to them contained in paragraph 579 of the plaintiffs' Complaint.

COUNT LIX

HIGH CALIBER INSPECTIONS, INC. - NEGLIGENCE

15. The co-defendants repeat herein and reaffirm their answer to paragraphs 1 through 579 of the plaintiffs' Complaint as said co-defendants' answer to paragraph 580 of the plaintiffs' Complaint.

16. The answering co-defendants deny all allegations pertaining to them contained in paragraph 581 of the plaintiffs' Complaint.

UNDERWRITERS AT LLOYD'S, LONDON AND
GRESHAM & ASSOCIATES OF R.I., INC.
THROUGH COUNT LXIV

17. The answering co-defendants do not have sufficient facts to admit or deny the allegations contained in paragraphs 582 through 610 of the plaintiffs' Complaint and leaves the plaintiffs to their proof of same.

FIRST AFFIRMATIVE DEFENSE

18. The plaintiffs' Complaint fails to state a viable claim against the answering defendants and, as such, the plaintiffs' Complaint should be dismissed.

SECOND AFFIRMATIVE DEFENSE

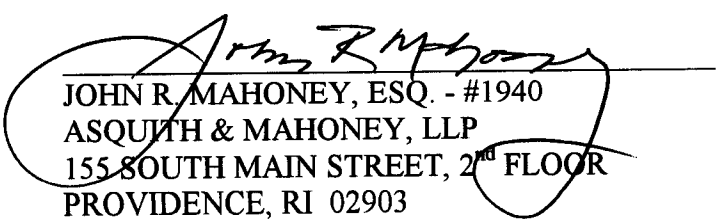
19. The answering defendants have no duty of care to the plaintiffs and, as such, their Complaint should be dismissed.

THIRD AFFIRMATIVE DEFENSE

20. The damages sustained by the plaintiffs were caused by and through the negligence of other people, firms or corporations for whom this defendant is not responsible.

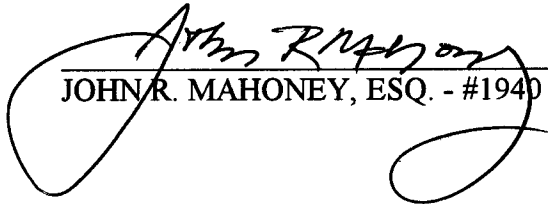
WHEREFORE, the answering co-defendants, Multi-State Inspections, Inc. and High Caliber Inspections, Inc., demand judgment against the plaintiffs, plus costs.

MULTI-STATE INSPECTIONS, INC. and
HIGH CALIBER INSPECTIONS, INC.,
BY THEIR ATTORNEY,


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THE ANSWERING CO-DEFENDANTS REQUEST A TRIAL BY JURY.



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CERTIFICATION

I hereby certify that on the 13th day of September, 2004 I mailed a true copy of the within
to:

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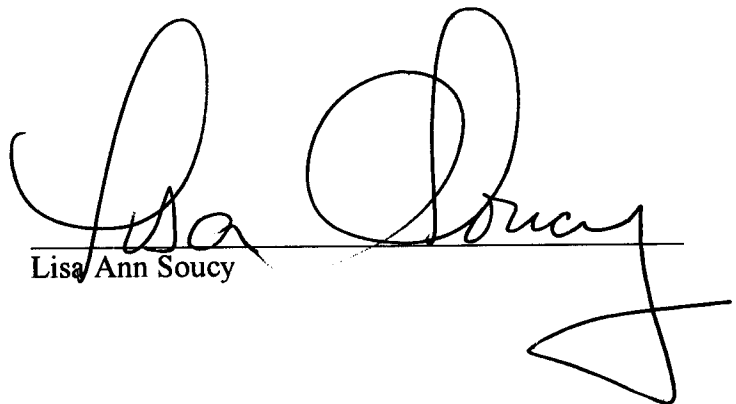
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